



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 17, 2020

**BY ECF AND EMAIL**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Application granted. The conference is adjourned to May 1, 2020 at 12:30 p.m. Time is excluded until May 1, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(a).

SO ORDERED.

**Re: *United States v. Joel Pena*, 18 Cr. 640 (RA)**

  
Ronnie Abrams  
United States District Judge March 17, 2020

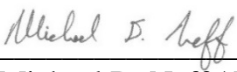
Dear Judge Abrams:

The parties in the above-captioned case respectfully and jointly submit this adjournment request in light of Standing Order M10-468 (*In re: Coronavirus/COVID-19 Pandemic*), issued March 13, 2020.

The parties have conferred regarding the anticipated change-of-plea hearing, currently scheduled for Tuesday, March 24, 2020. If it is acceptable to the Court, the parties jointly request an approximately 30-day adjournment. By way of context, the Government issued a plea offer approximately two weeks ago, but defense counsel needs to review that plea offer with the defendant—a process hindered by the MCC lockdown at first, and now the ongoing pandemic. (The defendant is housed at the MCC.) The parties note that, if this adjournment request is granted, time appears to be excluded under the Speedy Trial Act pursuant to Standing Order M10-468, ¶ 8. Such an exclusion is independently merited, as well—and consented to by the defense—as the requested adjournment will permit the defense to review a formal plea offer with the defendant. *See* 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By:   
Michael D. Neff / Brett M. Kalikow  
Assistant United States Attorneys  
(212) 637-2107 / 2220

cc: William J. Stampur, Esq. (by ECF and email)